

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA (ABINGDON)**

KIRA FERGUSON, *individually and as
Executrix of the Estate William S. Ferguson,
Deceased -and- SHANNON FERGUSON, in
her own right,*

Plaintiffs,

v.

SUSAN DOONAN BIELSKI,

Defendant.

NO: 1:23-cv-00032-JPJ-PMS

**MOTION FOR PRO HAC VICE ADMISSION
OF GERARD K. SCHROM**

Pursuant to Rule 8.0 of the Rules of Admission to Practice in the Commonwealth of Virginia, and of the Federal Rules of Civil Procedure for the District Court for the Western District of Virginia, Flux Jason Neo, Esquire, as a member in good standing of the Virginia State Bar, and admitted to practice before this Court, who agrees to and will be the responsible local attorney in this matter, hereby moves this Honorable Court to grant Gerard K. Schrom, an attorney not licensed to practice in the law in Virginia, the privilege to appear before this Court, for the purpose of representing Plaintiffs, Kira Ferguson, individually and Executrix of the Estate of William S. Ferguson, and Shannon Ferguson in her own right, in the above matter.

The verified statement of application of Gerard K. Schrom for *Pro Hac Vice* Admission is attached hereto and submitted in support of this motion.

WHEREFORE, the undersigned respectfully moves this Honorable Court to grant Gerard K. Schrom *Pro Hac Admission* for the purpose of representing Plaintiffs, Kria Ferguson, and Shannon Ferguson.

Respectfully submitted,

/s/ Flux J. Neo

Flux J. Neo, Esquire (VSB # 78873)

Flux J. Neo Law Firm, PLLC

179 Main Street

Tazwell, VA 24651

Phone: (276) 988-7996

Fax: (276) 988-6176

Email: office@neolaw1.com

Attorney for Plaintiffs

DATED:

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**VERIFIED STATEMENT OF APPLICATION OF
GERARD K. SCHROM FOR PRO HAC VICE ADMISSION**

Pursuant to Rule 8.0 of the Rules of Admission to Practice in the Commonwealth of Virginia, and LR. 6 (d) of the Federal Rules of Civil Procedure for the District Court for the Western District of Virginia, I Gerard K. Schrom, hereby submit the following verified statement in support of the Motion for *Pro Hac Vice* Admission in this proceeding:

1. I am a member in good standing of the Bar of the Commonwealth of Pennsylvania. My Pennsylvania Bar ID number is 39282. The Supreme Court of Pennsylvania is located at 601 Commonwealth Avenue, Suite 1500, Harrisburg, PA 17106, and the telephone number is (717) 231-3300. *See* Certificate of Good Standing that was issued by the Supreme Court of Pennsylvania attached hereto as Exhibit A.

2. I am the managing partner of the law firm of Schrom & Shaffer, P.C., and my principal office is located at 4 West Front Street, Media, PA 19063.

3. I have never been the subject of any disciplinary hearings and have not been disciplined at any time by any court or any bar. The name, address, and telephone number of the disciplinary agency for attorneys in the Commonwealth of Pennsylvania is the Disciplinary Board of the Supreme Court of Pennsylvania, 601 Commonwealth Avenue, Suite 2700, P.O. Box 62485, Harrisburg, PA 17106, (717) 231-3380.

4. I certify that my privilege to practice law and my membership in any bar association has never been amended, modified, suspended, revoked, or otherwise limited in any way, in any court, district, state, commonwealth or other jurisdiction. I also certify that I have never been convicted of any felony.

5. In the preceding 24 months, I have not been and am not currently involved in any other matters before the United States District Court for the Western District of Virginia tribunals or judicial bodies.

6. In the preceding 24, months, my law firm has not been and is not currently involved in any other matters before the United States District Court for the Western District of Virginia tribunals or judicial bodies.

7. I verify that I have fully complied with the United States District Court for the Western District of Virginia Rules of Practice and Procedures, and the Local Rules of this Court as they relate to admission to practice *pro hac vice* before this Court.

8. In accordance with Rules, I certify that I submitted this application and the requisite *pro hac vice* admission fee of \$100 payable to Clerk of Court for United States District Court for the Western District of Virginia.

9. I wish to appear and participate in this particular matter preceding in association with Flux J. Neo, Esquire, of Flux J. Neo Law Firm, PLLC, who has an actual physical office for practice within the Commonwealth of Virginia at 179 Main Street, Tazwell, VA 24651; phone number (276) 988-7996, to serve as the responsible local attorney in this matter.

10. I agree to comply with all the laws, rules, and regulations of this Honorable Court.

/s/ Flux J. Neo

Flux J. Neo, Esquire (VSB # 78873)
Flux J. Neo Law Firm, PLLC
179 Main Street
Tazwell, VA 24651
Phone: (276) 988-7996
Fax: (276) 988-6176
Email: office@neolaw1.com
Responsible Attorney
Dated:

Gerard K. Schrom, Esquire
Schrom & Shaffer, P.C.
4 West Front Street
Media, PA 19063
Phone: (610) 565-5050
Fax: (610) 565-2980
Email: gschrom@schromandshaffer.com
Applicant

Gerard K. Schromm, being first duly sworn, says upon his oath that the statements in the foregoing Verified Statement of Application of Gerard K. Schrom for *Pro Hac Admission* are true and correct.

Gerard K. Schrom, Esquire

Commonwealth of Pennsylvania

County of

Taken, subscribed, and sworn before me this _____, day of _____, 2023.

Notary Public

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PROPOSED ORDER

AND NOW, this _____ day of _____, 2023, upon review and consideration of the Motion and the Verified Statement and Application for Pro Hac Vice Admission of Gerard K. Schrom to represent Plaintiffs, Kira Ferguson, and Shannon Ferguson in this matter. The Court finds that Gerard K. Schrom has met all requirements for pro hac vice admission to appear and participate in this case.

Accordingly, it is hereby **ORDERED** and **DECREED** that the Motion for Pro Hac Vice Admission of Gerard K. Schrom to appear, participate and represent Plaintiffs Kira Ferguson and Shannon Ferguson in this case be **GRANTED**.

It is further **ORDERED** that Flux J. Neo, Esquire of the law firm Flux J. Neo Law Firm, PLLC, be and is hereby designated to act as responsible local counsel for Gerard K. Schrom, in this case as required by Rule 8(c) of the Rules for Admission to the Practice of Law in the Commonwealth of Virginia, as well as the 6 (d) of the Federal Rules of Civil Procedure for the District Court for the Western District of Virginia.

BY THE COURT:

**HONORABLE JAMES P. JONES
UNITED STATES DISTRICT COURT JUDGE**

EXHIBIT A